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9 **UNITED STATES DISTRICT COURT**
EASTERN DISTRICT OF CALIFORNIA
ROBERT T. MATSUI FEDERAL COURTHOUSE

10 CALIFORNIA SPORTFISHING
11 PROTECTION ALLIANCE,

12 Plaintiff,

13 v.

14 JEFFREY MACCOMBER, in his
15 official capacity as Secretary of
the California Department of
16 Corrections and Rehabilitation

17 Defendant

18 COUNTY OF AMADOR, a public agency
19 of the State of California

20 Plaintiff,

21 v.

22 JEFFREY MACCOMBER in his official
capacity as Secretary of the
California Department of
23 Corrections and Rehabilitation;
24 PATRICK COVELLO in his official
capacity of Warden of California
Department of Corrections and
25 Rehabilitation Mule Creek State
26 Prison,

27 Defendants
28

Case No.: 2:20-cv-02482-WBS-AC
[cons. w/2:21-cv-00038-WBS-AC]

**STIPULATION TO ENTER [PROPOSED]
CONSENT DECREE**

Judge: Hon. William B. Shubb

Action Filed: Jan. 7, 2021

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17 COUNTY OF AMADOR
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1 Plaintiffs CALIFORNIA SPORTFISHING PROTECTION ALLIANCE and
2 COUNTY OF AMADOR (collectively, "Plaintiffs") and Defendants
3 JEFFREY MACCOMBER, in his official capacity as Secretary of the
4 California Department of Corrections and Rehabilitation, and
5 PATRICK COVELLO, in his official capacity of Warden of California
6 Department of Corrections and Rehabilitation Mule Creek State
7 Prison, by and through their respective counsel, hereby stipulate
8 to the entry of the [Proposed] Consent Decree attached hereto as
9 **Exhibit A**, as set forth below:

10 WHEREAS, on May 25, 2023, Plaintiffs filed a Notice of
11 Settlement notifying the Court that the parties reached a settlement
12 in this matter and that the [Proposed] Consent Decree had been sent
13 to the U.S. Department of Justice ("DOJ") and the U.S. Environmental
14 Protection Agency for a 45-day review period as required by 33
15 U.S.C. section 1365(c) (Dkt. 128).

16 WHEREAS, on June 30, 2023, DOJ notified counsel by letter that
17 the United States does not object to the Court's entry of the
18 Consent Decree into judgment, attached hereto as **Exhibit B**.

19 WHEREAS, the Court may now enter the [Proposed] Consent Decree,
20 which includes a request that the Court retain jurisdiction to
21 enforce the terms of the [Proposed] Consent Decree if necessary.

22 THEREFORE, the Parties hereby request the Court sign the
23 [Proposed] Consent Decree, a true and correct copy of which is
24 attached as **Exhibit A**, and enter the Consent Decree as judgment.

25 The Parties further request that, after entering the
26 [Proposed] Consent Decree as judgment, the Court execute the
27 Proposed Order attached hereto as **Exhibit C**, dismissing Plaintiffs'

claims against Defendants, as set forth in Civil Case Nos. 2:20-cv-02482-WBS-AC and 2:21-cv-00038-WBS-AC (collectively, "Actions") with prejudice pursuant to Fed. R. Civ. Proc. 41(a)(2), subject to the continuing jurisdiction of the Court for enforcement purposes.

Dated: July 7, 2023

BEST BEST & KRIEGER LLP

By: s/ Rebecca Andrews

CHRISTOPHER M. PISANO

SHAWN D. HAGERTY

REBECCA ANDREWS

ANYA KWAN

Attorneys for Plaintiff

COUNTY OF AMADOR

Dated: July 7, 2023

LAW OFFICES OF ANDREW L. PACKARD

By: s/ Andrew L. Packard

ANDREW L. PACKARD

WILLIAM N. CARLON

Attorneys for Plaintiff

CALIFORNIA SPORTFISHING

PROTECTION ALLIANCE

Dated: July 7, 2023

AQUA TERRA AERIS LAW GROUP

By: s/ Erica A. Maharg

ERICA A. MAHARG

JASON R. FLANDERS

Attorneys for Plaintiff

CALIFORNIA SPORTFISHING

PROTECTION ALLIANCE

1 Dated: July 7, 2023

HARRISON, TEMBLADOR,
HUNGERFORD & GUERNSEY LLP

2
3 By: s/ Adam K. Guernsey
4 ADAM K. GUERNSEY
5 SEAN K. HUNGERFORD
6 Attorneys for Defendants
JEFFREY MACCOMBER &
PATRICK COVELLO

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8 I attest that concurrence in the filing of this document has
9 been obtained from all signatories indicated above.

10 Dated: July 7, 2023

AQUA TERRA AERIS LAW GROUP

11
12 s/ Erica A. Maharg
Erica A. Maharg